

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MASSACHUSETTS**

PRESIDENT AND FELLOWS OF HARVARD
COLLEGE,

Plaintiff,

v.

UNITED STATES DEPARTMENT OF
HEALTH AND HUMAN SERVICES, *et al.*,

Defendants.

Case No. 25-cv-10048-ADB

**UNOPPOSED MOTION OF COLUMBIA ALUMNI FOR ACADEMIC FREEDOM FOR
LEAVE TO FILE BRIEF AMICUS CURIAE**

Columbia Alumni for Academic Freedom (“CAAF”) respectfully seeks the Court’s leave to submit a brief amicus curiae in support of the motion for summary judgment filed by Plaintiffs President and Fellows of Harvard University. Counsel for Plaintiff and Defendants have been consulted; Plaintiff and Defendants do not oppose this motion.

CAAF is an unincorporated association of graduates of the undergraduate, graduate, and professional schools of Columbia University in the City of New York.¹ The association was created in March 2025 in response to the federal government’s unprecedented actions against the University, including a suspension or cancellation of \$400 million in federal research grants and

¹ Columbia’s 21 affiliated undergraduate, graduate and professional schools include Barnard College; Columbia College; Fu Foundation School of Engineering and Applied Sciences; the School of the General Studies; the School of the Arts; the Graduate School of Architecture, Planning, and Preservation; the Graduate Schools of Arts and Sciences; Columbia Business School; Columbia Journalism School; Columbia Law School; the College of Dental Medicine; the School of International and Public Affairs; Jewish Theological Seminary; the School of Nursing; Vangelos College of Physicians and Surgeons; the Mailman School of Public Health; the School of Social Work; Teachers College; and the Union Theological Seminary.

contracts and demands that Columbia make significant changes to various University operations, programs, and policies. CAAF's inaugural statement explained that the Trump Administration's "extortive" actions:

represent a grave threat to Columbia's institutional independence and to the academic freedom and free inquiry that are the bedrock of universities in free societies. Such ultimatums, made without due process, would be unlikely to stand in a court of law, as legal scholars from across the political spectrum have emphasized. Rewarding such extortion will only embolden President Trump and his administration to further encroach on academic freedom. The Trump administration has already initiated similar attacks against other universities as part of a larger strategy to quell dissent and undermine core freedoms foundational to democracy.

Statement on Academic Freedom, <https://www.columbiaalumniforacademicfreedom.org/>.

Explaining that they are "are deeply invested in ensuring that academic freedom and the right to free expression are protected in our universities and in American society," the alumni signatories undertook to support "academic freedom at Columbia and all institutions of higher learning." *Id.*

The proposed brief is in furtherance of that commitment. It explains that Administration's unlawful campaign extends far beyond Harvard. It has hit Columbia hard, including through the imposition of massive summary financial sanctions gravely harming key University functions, flagrant disregard for the most rudimentary requirements of the Civil Rights Act provision that ostensibly underlies the federal government's actions—and now, threats to Columbia's accreditation. Columbia's example further illustrates the importance of protecting freedom of expression and restraining egregious Executive overreach. CAAF is deeply concerned about what these punitive and lawless actions mean for an institution that has enriched our lives and contributed abundantly to the common good. And, as CAAF recognized from the outset and the proposed amicus brief underscores, the educational and society benefits Columbia contributes, the democratic values of free and open inquiry it instills and embodies, and the conditions necessary to its survival and continued vitality are not unique to our alma mater. What the

federal government is doing to Harvard and to Columbia is essentially the same—in the nature of the threats and their ostensible rationale, a transparently pretextual claim to enforce a federal civil rights statute; in their fundamental lawlessness; and in the chosen means, including wanton destruction of ongoing world-changing and life-saving research activities. Indeed, they are fairly understood as a single unitary effort—a campaign to bring America’s leading institutions of higher learning to heel, one justly described as “the most serious assault on academic freedom in American history.”²

Accordingly, CAAF respectfully requests that the Court exercise its discretion, see *Strasser v. Doorley*, 432 F.2d 567, 569 (1st Cir. 1970); *Massachusetts Food Ass'n v. Massachusetts Alcoholic Beverages Control Com'n*, 197 F.3d 560, 567 (1st Cir. 1999), and accept our amicus brief, which complies with the requirements of the Court’s scheduling order.

CONCLUSION

CAAF should be granted leave to file the proffered brief amicus curiae.

Respectfully submitted,

/s/ Jocelyn B. Jones
 Jocelyn B. Jones, 640958
 Segal Roitman, LLP
 33 Harrison Ave., 7th Fl.
 Boston, MA 02111
 jjones@segalroitman.com
 (617) 899-1382

/s/ Sean H. Donahue
 Sean H. Donahue (*Pro Hac Vice Motion Pending*)
 Donahue, Goldberg & Herzog
 1008 Pennsylvania Ave., SE
 Washington, D.C. 20003
 sean@donahuegoldberg.com
 (202) 277-7085

² Michael Ignatieff, *An Authoritarian Came for my University. His Objective was Clear*, WASHINGTON POST, (June 2, 2025), https://www.washingtonpost.com/opinions/2025/06/02/trump-harvard- attack-viktor-orban-ceu-hungary/?utm_source=chatgpt.com.

LOCAL RULE 7.1 CERTIFICATION

Pursuant to Local Rule 7.1(a)(2), counsel for Plaintiff conferred with counsel for Plaintiff and Defendants regarding the filing of this motion. Counsel for all parties have consented to the filing of this motion.

/s/ Jocelyn B. Jones

CERTIFICATE OF SERVICE

I, Jocelyn B. Jones, hereby certify that a true copy of this document filed through the ECF system will be sent electronically to the registered counsel on June 6, 2025.

/s/ Jocelyn B. Jones